

The Huntington National Bank

Legal Department
Huntington Center
41 South High Street
Columbus, Ohio 43287

December 23, 2010

By e-mail to: regs.comments@federalreserve.gov

Jennifer J. Johnson, Secretary
Board of Governors of the Federal Reserve System
20th Street and Constitution Avenue, N.W.
Washington, D.C. 20551

Attn: Docket Number R-1390

Re: Proposed Rule under Regulation Z
75 FR 58539 (September 24, 2010)

Dear Ms. Johnson:

This letter is submitted on behalf of The Huntington National Bank¹ in response to the above-referenced rule proposed by the Board of Governors of the Federal Reserve System (the “Board”) with respect to changes in Regulation Z. We appreciate the opportunity to provide the comments set forth below with respect to the proposed rule.

Board Staff has issued a complex 250-page proposal that will change several aspects of requirements under Regulation Z for home-secured credit, and this is in addition to several other current proposals and final rules affecting Regulation Z. We also take note of the requirement in §1032(f) of the Dodd-Frank Wall Street Reform and Consumer Protection Act for the newly created Bureau of Consumer Financial Protection (the “Bureau”) to propose within one year after the “designated transfer date” (currently, July 21, 2011) model disclosures combining the requirements of the Truth in Lending Act (“TILA”) and the Real Estate Settlement Procedures Act (“RESPA”) into a single integrated disclosure. This Dodd-Frank requirement will

¹ The Huntington National Bank (“Huntington Bank”) is a national bank and the principal subsidiary of Huntington Bancshares Incorporated, which is a \$53 billion regional bank holding company headquartered in Columbus, Ohio. Huntington Bank has more than 144 years of serving the financial needs of its customers, and together with its affiliated companies provides a full range of financial services, including checking, loans, savings, insurance and investment services. It has more than 600 branches and also offers retail and commercial financial services online, through its telephone bank, and through its network of over 1,350 ATMs.

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significantly change the way closed-end home-secured credit is disclosed, and it seems unnecessarily burdensome for the Board to be making substantial changes to the disclosure requirements of Regulation Z for closed-end home-secured credit when the Bureau will within a short period of time be changing the rules yet again.

Because this current proposal is a part of Board Staff's comprehensive review of TILA's rules for home-secured credit, rather than being required as of a specific date by statutory mandate, we believe it would be most appropriate for the Board to suspend this proposal and leave it for consideration by the Bureau in connection with the Bureau's TILA/RESPA disclosure project and after the authority for issuing rules under TILA and RESPA transfers to the Bureau on the designated transfer date.

Thank you for the opportunity to provide these comments.

Very truly yours,

A handwritten signature in black ink, appearing to read "Daniel W. Morton", with a stylized flourish at the end.

Daniel W. Morton
Senior Vice President & Associate General Counsel